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Environmental
Cleanup Office

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December 11, 2006

Douglas Management Co.
P.O. Box 3757
Seattle, Washington 98124-3757
(206) 241-8778
(800) 426-3201
Fax: (206) 243-8415

US EPA, Region 10
Ms. Claire Hong, Remedial Project Manager
Environmental Cleanup Office
1200 Sixth Ave., ECL-111
Seattle, Washington 98101

Re: CERCLA 104(e) Request, Lower Duwamish Waterway,
Swan Bay Holdings / Douglas Management Company

Dear Ms. Hong:

Enclosed is our initial response to your 104(e) request for information. Our documents are copied onto the two computer disks. As noted in the written responses, certain financial statements will be following soon.

Please note that we have asserted a confidentiality claim for the financial information, and have segregated that information on Disk #2. Each document was not labeled "Company Confidential" before it was put on the disk, but the disk itself is so labeled.

Thank you again for accommodating our request for additional time to complete our response. We have provided all responsive materials that we have located to date. If you have any specific questions, please contact us and we will do our best to assist.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rod DeWalt', written over a horizontal line.

Rod DeWalt
President

Enclosures

U.S. EPA
CERCLA SECTION 104(e)

INFORMATION REQUEST

Respondent: Mr. Rod DeWalt

Site: Lower Duwamish Waterway, Seattle WA
Swan Bay Holdings*
18000 International Boulevard, #800 Seattle, Washington 98188-
4255 King County Parcel Numbers 2924049090 or 6871200035 (the
"Property")

Date: 1977 to present

Please note: this Information Request includes instructions for responding to this request and definitions of words such as "Respondent," "Site," and "identify" used in the questions.

INFORMATION REQUEST QUESTIONS

1. Respondent Information

- a. Provide the full legal name and mailing address of the Respondent.

*Douglas Management Company
Rod DeWalt, President
18000 International Blvd, Suite 800
Seattle, WA 98188*

**Douglas Management Company (DMC) is responding rather than Swan Bay Holdings, Inc. (SBH), the company that received this request. DMC is the current owner of the Property, having purchased it from SBH on December 16, 2004. Please see §3.a. for a summary of the ownership history of the Property.*

- b. For each person answering these questions on behalf of Respondent, provide:

- i. full name;
- ii. title;
- ii. business address;
- iv. business telephone number and FAX machine number.

*Rod DeWalt, President
Douglas Management Company
18000 International Blvd., Suite 800*

Seattle, WA 98188
Tel: (206) 241-8778
Fax: (206) 243-8415

Everett Billingslea, Secretary
Douglas Management Company
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Seattle, WA 98188
Tel: (206) 241-8778
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Ken Allen, Financial Analyst
Lynden Incorporated
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Bob Strong, Safety Director
Lynden Incorporated
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Kitty Samuel, Treasurer
Douglas Management Company
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Tel: (206) 241-8778
Fax: (206) 243-8415

Stephanie Littleton, Vice President, Tax
Lynden Incorporated
18000 International Blvd., Suite 800
Seattle, WA 98188
Tel: (206) 241-8778
Fax: (206) 243-8415

Dick Korpela, Assistant Secretary
Douglas Management Company
18000 International Blvd., Suite 800
Seattle, WA 98188
Tel: (206) 241-8778
Fax: (206) 243-8415

Susan Kunz, Purchasing Manager
Alaska Marine Lines, Inc.
18000 International Blvd., Suite 800
Seattle, WA 98188
Tel: (206) 241-8778

Fax: (206) 243-8415

*Andrew Heuscher, HSSE Director
Alaska Marine Lines, Inc.
18000 International Blvd., Suite 800
Seattle, WA 98188
Tel: (206) 241-8778
Fax: (206) 243-8415*

- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, and fax number.

*Rod DeWalt, President
Douglas Management Company
18000 International Blvd., Suite 800
Seattle, WA 98188
Tel: (206) 241-8778
Fax: (206) 243-8415*

- d. State the dates during which Respondent held any property interests at or within one-half mile of the above mentioned address.

See response to §3.a.

- e. State the dates during which Respondent conducted any business activity at or within one half mile of the above mentioned address.

See response to §3.a.

- f. Describe the nature of Respondent's business activities at the above mentioned address or within one-half mile of that address.

See response to §3.a.

- g. In relation to your answer to the previous question, identify all materials used or created by your activities at the above mentioned address, including raw materials, commercial products, building debris, and other wastes.

Incidental activities related to moored vessels has involved concrete and steel materials.

- h. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:
- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;

- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

Not Applicable

2. Site Activities and Interests

- a. Provide all documents in your possession regarding the ownership or environmental conditions of the property mentioned above, including, but not limited to, copies of deeds, sales contracts, leases, blueprints, "as-builts" and photographs.

See enclosed Disk #1

- b. Provide information on the condition of the property when purchased; describe the source, volume, and content of any fill material used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.

See enclosed Disk #1

- c. Provide a brief summary of the activities conducted at the site while under Respondent's ownership or operation. Include process diagrams or flow charts of the industrial activities conducted at the site.

See response to §3.a

- d. Provide all documents pertaining to sale, transfer, delivery, disposal, of any hazardous substances, scrap materials, and/or recyclable materials to this property.

See enclosed Disk #1

- e. Provide all information on electrical equipment used at the facility, including transformers or other electrical equipment that may have contained polychlorinated biphenols (PCBs).

Transformers owned by Seattle City Light are located on the Property.

- f. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances which are or were used at the facility for facility operations.

Forklifts, cranes, trucks and other heavy equipment related to equipment storage and vessel moorage have operated on the Property. Such equipment contains diesel fuel, and standard lubricating and hydraulic oils.

- g. Provide any site drainage descriptions, plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch

basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to sanitary sewer.

See enclosed Disk #1

With respect to past site activities, please provide copies of any stormwater or drainage studies, including data from sampling, conducted at these properties. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during the Respondent's occupation of the property.

See enclosed Disk #1

3. Information About Others

- a. Describe any business relationship you may have had with Alaska Western Industries, Knik Construction, Douglas Management Company, or Alaska Marine Lines regarding this property or operations thereon.

Knik Construction Co., Inc. ("Knik") acquired the Property from Alaska Western Industries, Inc. on February 22, 1977. The purchase of the Property was the sole business relationship between Alaska Western Industries, Inc. and Knik. Knik operated a sand and gravel batch plant on the Property for approximately six to nine months following the purchase. The Property was then leased to Associated Bus Services for several years and used for school bus parking and light maintenance.

On June 30, 1981, Knik sold the Property to DMC, which continued the existing use of the Property. Then, on October 1, 1984, the property was sold to Alaska Marine Lines, Inc. ("AML") for use as a barge terminal. On December 10, 1993, AML sold the property back to DMC, and the Property entered its current use as an equipment storage yard and barge mooring facility, and for related activities, including marine cargo handling. The Property has also been regularly used to transfer gravel imported by barge.

On June 29, 1995 DMC sold the Property to SBH, and leased it back. Then, on December 16, 2004, SBH sold the Property back to DMC. DMC currently leases adjacent State of Washington right-of-way, for a month-to-month term that commenced on June 1, 2003.

- b. Describe any business relationship you may have had with SRM Industries and Seattle Ready Mix Concrete, Inc. regarding this property or operations thereon.

None known

- c. Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a brief description of the activities they conducted while operating on the above mentioned site.

Knik and AML are the primary uses of the Property. They pay usage fees, but do not have leases for the Property.

- d. If not already provided, identify and provide a last known address or phone number for all

persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous materials to or from, the Site.

All inquiries should be directed to Rod DeWalt at DMC, contact information above. See also, §1.b.

4. Financial Information

All financial and tax information of Lynden is highly sensitive and confidential. We hereby assert a confidentiality claim under 42 U.S.C. §§960(e)(7)(E) and (F), and 40 C.F.R. §2.203(b), as applicable. All documents on Disk #2 are "Company Confidential".

- a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2001, 2002, 2003, 2004 and 2005. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.

DMC is a qualified subsidiary of a Subchapter S corporation and therefore does not file separate tax returns. However, the filing information related to DMC can be provided on pro forma returns, copies of which are enclosed on Disk #2. DMC's federal Tax Identification Number is

- b. Provide the Respondent's financial interest in, control, or that the Respondent is beneficiary of any assets (in the U.S. or in another country) that has not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, please identify each asset by type of asset, estimated value, and location.

DMC's fixed asset listings are enclosed on Disk #2. The assets are located at the Property, or at one of the following addresses.

*500 Cornwall Avenue
Bellingham, Washington 98124*

*6250 S. 228th Street
Kent, Washington 98032*

If more detail is required, please let us know and we will respond at that time.

- c. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
- i. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
 - ii. the dates such relationship existed;

- iii. the percentage of ownership of Respondent that is held by such other entity(ies);

DMC is a wholly-owned subsidiary of Lynden Incorporated ("Lynden"), and has been since it was incorporated on November 12, 1974. DMC is an independent property management company that owns and manages real estate, primarily for other Lynden-owned companies. It operates as an autonomous company, and its day-to-day business decisions are made by its President. This has been the case since DMC was formed, to the present. Lynden provides bookkeeping, financial, tax, legal, information technology, and other such parent company services to its subsidiaries, including DMC, on a contract basis.

- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;

Lynden owns a large number of subsidiaries, most of which have no connection with or relevance to the Property. We believe it would be confusing and burdensome to provide information pertaining to all Lynden companies. Accordingly, we are providing information pertaining to the relevant companies, Knik and AML, each of which is wholly-owned by Lynden. If a need arises for information pertaining to other companies, please let us know and we will respond at that time.

LYNDEN INCORPORATED

18000 International Blvd., Suite 800
Seattle, WA 98188

DIRECTORS:

Jim Jansen
Paul W. Steere
Richard A. Korpela
Vic Jansen
Guy Jansen
Jonathan R. Burdick

OFFICERS:

Paul W. Steere - Chairman of the Board
Jim Jansen - President
Richard A. Korpela - Executive Vice Presidents, Secretary and Treasurer
Jonathan R. Burdick - Executive Vice President
David W. Haugen - Vice Presidents
Everett H. Billingslea - Vice President
Kitty Samuel - Vice President
Stephanie Littleton - Vice President
Ann Suver - Vice President
Marian Luther - Assistant Secretary

SHAREHOLDERS (with 5% or more ownership):

Eleanor P. Jansen Disclaimer Trust
James H. Jansen

Heidi Doornenbal
Victor C. Jansen
Pauli J. Hall
Guy A. Jansen

KNIK CONSTRUCTION CO., INC.
18000 International Blvd., Suite 800
Seattle, WA 98188

DIRECTORS:

Jim Jansen
Vic Jansen

OFFICERS:

Steve Jansen – President
David W. Haugen – Vice President
Perry Rekers – Vice President
Kitty Samuel – Treasurer
Everett H. Billingslea – Secretary
Richard A. Korpela – Assistant Secretary
Linda Girman – Assistant Secretary
Marian Luther – Assistant Secretary

SHAREHOLDER:

Lynden Incorporated

ALASKA MARINE LINES, INC.
18000 International Blvd., Suite 800
Seattle, WA 98188

DIRECTORS:

Jim Jansen
Richard A. Korpela
Paul W. Steere
Jonathan R. Burdick

OFFICERS:

Gail Knapp – President
Don Reid – Vice President
Kevin Anderson – Vice President
Kitty Samuel – Treasurer
Everett H. Billingslea – Secretary
Richard A. Korpela – Assistant Secretary
Marian Luther – Assistant Secretary

SHAREHOLDER:

Lynden Incorporated

- v. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at the Site; and

See enclosed Disk #1, and §5.a

- vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Because DMC is an independent and separately managed corporation, the financial information of its parent and sibling companies have no direct relevance to the Property, except for siblings Knik and AML which have operated on the Property. The most recent financial statements for DMC, Knik and AML are expected to be complete by December 15, 2006 and will be provided soon thereafter.

As privately owned companies, financial information of Lynden-owned companies is highly sensitive. Accordingly, when the financial statements are provided, they will be marked "Company Confidential" and a confidentiality claim under 42 U.S.C. §§960(e)(7)(E) and (F), and 40 C.F.R. §2.203(b) will be made.

5. Insurance Coverage

- a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup, and include the years such policies were in effect.

Our historic and current insurance policies have been reviewed to determine if coverage may be available for contamination that may be on properties owned by DMC. We concluded that if coverage is available, it would be through policies placed in 1975 with Alaska Pacific Assurance Company, or placed in 1980 with Providence of Washington Insurance Group. We were unable to locate copies of those policies in our records, but found evidence of them in old correspondence, copies of which are on Disk #1. If you would nonetheless like copies of all old insurance policies that we have located, please let us know.

- b. If there are any such policies from questions a & b above of which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:
 - i. the name and address of each insurer and of the insured;
 - ii. the type of policy and policy numbers;
 - iii. the per occurrence policy limits of each policy; and
 - iv. the effective dates for each policy.

See §5.a

- c. Identify all insurance brokers or agents who placed insurance for the Respondent at any time during the period being investigated, as identified at the beginning of this request, and identify the time period during which such broker or agent acted in this regard.

When DMC was formed in 1974, Fred S. James & Co. of Washington was the insurance broker for DMC. That brokerage was acquired by Sedgwick in 1986, which in turn was acquired by Marsh & McLennan Companies in 1998 and became part of Marsh USA, the broker handling DMC's insurance today.

- d. Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of the Respondent under any insurance policy in connection with the site. Include any responses from the insurer with respect to any claims.

See §5.a

- e. Identify any previous settlements with any insurer in connection with the site, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by the Respondent or insurer.

None

- f. Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.

Lynden maintains a consolidated insurance program. Premiums are paid by Lynden and billed to DMC and other entities according to an internal allocation method.

- g. Identify Respondent's policy with respect to document retention.

DMC has recently adopted a formal document retention policy that we are in the process of refining and implementing. A copy of that policy follows:

1. Records Retention and Destruction Policy.

The Company will retain all records for periods required by law and prudent business practices, in paper or electronic form, in accordance with the Company's official records retention schedules. To the greatest extent practical, records will be indexed and stored using methods and technology that minimize duplication and loss, and allow convenient and timely access by internal and remote viewers. Records may be destroyed only with the approval of the record custodian specified on the records retention schedules. Each employee shares responsibility for proper management and disposition of the records created or handled in the course of business, and must exercise due diligence in complying with this policy.

- a. **Legal Hold.** *No relevant records may be destroyed after receipt of legal process, indication of potential litigation, governmental request, or reasonable indication that the records have become the subject of corporate governance, regulatory, or other legal concerns. Upon becoming aware of any such indication, each*

employee must cease destruction of relevant records and notify the Records Retention Key Contact (see Appendix A) who, in consultation with counsel as necessary, will place a legal hold on the relevant records and immediately notify relevant personnel by appropriate means. A legal hold will remain in place until released by the Records Retention Key Contact (see Appendix A).

- b. **Definition of "Record."** A business record subject to this policy includes all recorded information, irrespective of medium (e.g., email, paper, scanned image, computer code, photograph/video, audiotape, etc.), that has material business, audit, legal, compliance, operational or historical value to the Company. Identical copies of records are not records themselves. Incidental or transitory communications are not records.*
- c. **Filing of Records.** To the greatest extent practical, all records should be stored electronically in the appropriate file folder in the Company's electronic central filing and document management system known as "File Cabinet." File Cabinet is to be used for the organization and archiving of final documents and clearly identified drafts or document versions that have independent archival value, and for audit purposes. File Cabinet is not to be used as a personal file back up storage area.*

Paper documents should be scanned in their entirety as PDF files before being electronically labeled with search terms and filed. Any electronic format may be stored in File Cabinet; however PDF is strongly preferred and should be used whenever possible for scanned documents. The final electronic version of a scanned document, if available, should also be stored in File Cabinet in Microsoft Word format so as to be available for future use. All documents stored in File Cabinet must be given proper filenames according to the File Cabinet user guidelines. Once properly filed in File Cabinet, the paper version of a document may become a convenience copy and destroyed when no longer useful. See the File Cabinet User Guide found under the Manuals pop-up menu, User Guides, on the Lnet. Further assistance may be obtained from the records retention key contact (Appendix A).

Each employee shares responsibility for the proper utilization of File Cabinet and must exercise due diligence in complying with this policy. Proper utilization is necessary to avoid degradation of the system. Failure to comply with this policy may result in lost or reduced access to File Cabinet.

- 6. Compliance with This Request.** Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

- a. the name and current job title of all individuals consulted;

See §1.b

*Chuck Blumenfeld
Perkins Coie
1201 Third Ave, Suite 4800
Seattle, WA 98101*

- b. the location where all documents reviewed are currently kept.

*18000 International Blvd, Suite 800
Seattle, WA 98188*

INSTRUCTIONS

1. Answer Each Question Completely. Provide a separate answer to each question and subpart set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject the Respondent to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.
4. Identify Information Sources. For each question, identify all persons and documents relied upon for the answer.
5. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." A confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice.**
6. Disclosure to EPA Contractor. Information submitted in response to this Information Request may be disclosed by EPA to authorized representatives of the United States,

pursuant to 40 C.F.R. 2.310(h), even if the Respondent asserts that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If submitting information and asserting it is entitled to treatment as confidential business information, the Respondent may comment on EPA's intended disclosure within 14 days of receiving this Information Request.

7. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from responses, included on separate sheet(s), and marked as "Personal Privacy Information". Note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice.
8. Objections. The Respondent must provide responsive information notwithstanding objections to certain questions. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.
9. Privilege. If a privilege is asserted for any document responsive to this Information Request, identify (see Definitions) the document and provide the basis for assertion. If a privilege exists for only a portion of a document, provide the portion of the document that is not asserted be privileged, identify the portion that is asserted to be privileged, and provide the basis for asserting privilege. **Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.**
10. Declaration. The Respondent must complete the enclosed declaration, certifying the accuracy of all statements in your response.

DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601, *et seq.*, or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "Respondent" shall mean the addressee of this Request, together with the addressee's agents, employees, and contractors.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include, but not be limited to:
 - a. writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, fax transmittals;
 - ii. meeting minutes, telephone records, notebooks;

- iii. agreements and contracts;
 - iv. reports to shareholders, management, or government agencies;
 - v. transportation manifests;
 - vi. copies of any document. b. any film, photograph, or sound recording on any type of device;
 - c. any blueprints or drawings;
 - d. attachments to, or enclosures with, any document.
3. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position, or business.
 4. The term "identify" means, with respect to a corporation, partnership, business trust, or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
 5. The term "identify" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. **Alternatively**, Respondent may provide a complete copy of the document.
 6. The term "material" or "materials" shall mean any and all raw materials, commercial products, wastes, chemicals, substances, or matter of any kind.
 7. The "period being investigated" and "the relevant time period" shall mean 1995 to present.
 8. The term "property" shall mean any interest in real or personal property whatsoever, including fee interests, leases, licenses, rental, and mineral rights.
 9. The "Site" shall mean any or all property or area described as or near 7100 2nd Avenue SW or 160 South Orchard Street; and King County Tax Parcels Numbers 2924049090 or 6871200035.
 10. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including, but not limited to, building debris and asbestos-containing material.
 11. The term "business activities" shall mean all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Site, including surveying, sampling, grading, documentation, photography, demolition,

construction, and waste disposal, and sales.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct to the best of my knowledge.

Executed on 12/11/, 2006.

Signature: 
Type or Print Name: Rod DeWalt
Title: President

Mailing Address:
Mr. Rod DeWalt
Douglas Management Company
18000 International Blvd., #800
Seattle, Washington 98188

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 SIXTH AVENUE
SEATTLE, WA 98101

TARGET SHEET

The following document was not imaged.

This is due to the Original being:

_____ Oversized

XX _____ CD Rom

_____ Computer Disk

_____ Video Tape

_____ Other:

**A copy of the document may be requested from the Superfund Records Center.

Document Information

Document ID #: _____ 1259369

File #: _____ 12.3.29

Site Name: _____ Lower Duwamish Waterway (LDWSF)

_____ Douglas Management Co.
